

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1) ALEJANDRO ZAVALA
[DOB: 09/24/1999],

(2) CODY BONHOMME
[DOB: 03/30/1993],

and,

(3) KALEB ACUNA
[DOB: 03/28/2001].

Defendants.

Case No. _____

COUNT ONE:

(Conspiracy to Traffic Firearms)

All Defendants

18 U.S.C. §§ 933(a)(1), (3), and (b)

NMT: 15 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class C Felony

COUNT TWO

***(Conspiracy to Distribute and Possess with the
Intent to Distribute Cocaine and Marijuana)***

All Defendants

21 U.S.C. §§ 841(a)(1), (b)(1)(B), and 846

NLT 5 Years Imprisonment

NMT 40 Years Imprisonment

NMT \$5,000,000 Fine

NLT 4 Years Supervised Release

Class B Felony

\$100 Mandatory Special Assessment for Each
Count

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Conspiracy to Traffic Firearms)

From on or about March 1, 2023, to on or about May 31, 2023, in the Western District of Missouri, the defendants, ALEJANDRO ZAVALA, CODY BONHOMME, and KALEB ACUNA, did knowingly and intentionally combine, conspire, confederate and agree with each other, and with others both known and unknown, to ship, transport, transfer, cause to be transported, or otherwise dispose of firearms, to wit the following firearms:

*Anderson AM-15, multi-cal semiautomatic pistol, bearing serial # 22104043

*Polymer80, Model PF940SC 9 mm pistol, bearing no serial number converted to a machinegun

*Polymer80 pistol, bearing no serial number, with an uninstalled Machinegun Conversion Device (MCD)

*Anderson AM-15, multi-cal semiautomatic pistol, bearing serial #22104026 converted to a machinegun

*Anderson AM-15, multi-cal semiautomatic pistol, bearing serial #22104040 converted to a machinegun

*Glock, Model 22, .40 caliber pistol, bearing serial number MSE914 converted to a machinegun

*DPMS, Model A-15, multi caliber, bearing serial number N0000786 converted to a machinegun

*Anderson, AM-15, multi caliber firearm, bearing serial number 22114018 converted to a machinegun

*Anderson, AM-15, multi caliber firearm, bearing serial number 22055738 converted to a machinegun

*2 Polymer80, model PF940SC, 9mm caliber pistols bearing no serial numbers with two uninstalled MCDs

intentionally to another person in or otherwise affecting commerce, knowing, or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1), (3) and (b).

COUNT TWO

Conspiracy to Distribute and Possess with the Intent to Distribute Cocaine and Marijuana

From on or about March 1, 2023, to on or about May 31, 2023, in the Western District of Missouri, the defendants, ALEJANDRO ZAVALA, CODY BONHOMME, and KALEB ACUNA, did knowingly and intentionally combine, conspire, confederate and agree with each other, and with others both known and unknown, to knowingly and intentionally distribute and possess with the intent to distribute 500 grams or more of a mixture or substance containing a

detectable amount of cocaine, its salts, optical and geometric isomers and salts of its isomers, a Schedule II controlled substance, and marijuana, a Schedule I controlled substance, and in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B) and 846.

A TRUE BILL.

06/20/2023
DATE

/s/ Taylor Jahn
FOREPERSON OF THE GRAND JURY

/s/ David Barnes
David A. Barnes
Assistant United States Attorney
Violent Crime & Drug Trafficking Unit One
Western District of Missouri